

December 16, 2018

US Environmental Protection Agency
Attn: Portland Harbor Comments
805 SW Broadway, Ste. 500
Portland OR 97205

To whom it may concern,

I have several concerns in regard to EPA's implementation of new toxic levels for benzopyrene (a) also known as BaP, on the Willamette River superfund site:

- 1) Because the chemical is concentrated in north Portland, it should be reduced to equal the rest of the urban Willamette for the sake of equity.
- 2) There is no information on skin contact even though Cathedral and Kelley Point beaches are affected by a hotspot. There is no assurance that beaches or swimming would be safe.
- 3) All activities such as swimming, boating, recreation, and fishing, should be considered in interpreting the change, not just dock work.
- 4) Pollutant mixtures that can be more toxic than the original pollutant. EPA has not studied mixtures and cannot give assurance that they would be safe.
- 5) Breakdown byproducts can be more toxic than the original pollutant. EPA has not studied break down byproducts and cannot give assurance that they would be safe.
- 6) Wildlife protection must be assured. Un-remediated chemical residues in river sediments affects the biological chain of life, harming multiple levels of fauna.

Interpretation of BaP updated toxic values should help, not hinder the goal of a multi-use river as strongly expressed by the community in the Record of Decision. River access should be safe everywhere.

Thank you,

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Portland, OR 97219